

Before The
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Post Office Structure Plan

Docket No. N2012-2

INTERROGATORIES OF ELAINE MITTLEMAN
TO UNITED STATES POSTAL SERVICE
(EM/USPS-1-27)
June 22, 2012

Pursuant to 39 C.F.R. §§ 3001.25 through 3001.28, Elaine Mittleman
hereby submits the following interrogatories.

Respectfully submitted,

/s/ Elaine Mittleman
Elaine Mittleman
2040 Arch Drive
Falls Church, VA 22043
(703) 734-0482
elainemittleman@msn.com

ELAINE MITTLEMAN INTERROGATORIES TO USPS

EM/USPS-1. How will the hours be determined for a post office to be open? If customers need to be able to use the post office early in the morning and/or at the end of the day, will the post office be open at both times?

EM/USPS-2. If persons conducting business need access to postal services at random times during the day, rather than at a scheduled time, how can they get that access?

EM/USPS-3. If persons want to have a package picked up by a carrier, how much lead time is needed to request pick-up? If persons are on a deadline and need prompt service to be able to mail a package, what options are available to them to use the Postal Service, rather than an alternative, such as UPS or FedEx?

EM/USPS-4. Are the hours of operation of the retail facilities being reduced to achieve cost savings for the Postal Service?

ELAINE MITTLEMAN INTERROGATORIES TO USPS

EM/USPS-5. How will the cost savings to the Postal Service of reducing retail hours be determined? What method will be used to determine the loss of revenue from reducing retail hours?

EM/USPS-6. Does the Postal Service determine the economic savings of reducing retail hours? If so, how are economic savings determined or calculated?

EM/USPS-7. Does the Postal Service determine or calculate both the costs savings and the economic savings of reducing retail hours?

EM/USPS-8. What effect will reducing retail hours have on the lease terms and costs of postal facilities? Will the Postal Service include any lease costs or savings in determining the reduced hours for retail facilities?

EM/USPS-9. What will happen to the postal facilities in the hours that they will be closed after the reduced hours have been implemented? Are there safety and environmental concerns about having postal facilities closed for a majority of the day?

ELAINE MITTLEMAN INTERROGATORIES TO USPS

EM/USPS-10. Will some postal workers have hours reduced to two or four work hours per day? Will some postal workers have to travel to several retail facilities during each work day?

EM/USPS-11. Other than any potential cost savings, what advantages to the customers, the postal workers and USPS will result from this plan to reduce retail hours?

EM/USPS-12. What is the status of the final determinations issued by the Postal Service from January 2011 to the present concerning closing post offices?

EM/USPS-13. Will the Postal Service withdraw the final determinations it has issued for post offices that have not closed?

EM/USPS-14. What is the status of the cases remanded by the Postal Regulatory Commission back to the Postal Service?

ELAINE MITTLEMAN INTERROGATORIES TO USPS

EM/USPS-15. What procedure does the Postal Service use to review cases that have been remanded by the Postal Regulatory Commission?

EM/USPS-16. Are there appeal rights available after a remand by the Postal Regulatory Commission?

EM/USPS-17. Does the Postal Service consider a remand order of the Postal Regulatory Commission to be binding or does it consider a remand order to be an advisory opinion?

EM/USPS-18. What definition of community does the Postal Service use in determining the effect on the community of a change in service or change or relocation of retail facilities?

EM/USPS-19. What was the cost to the Postal Service of the closing process and RAOI, including community meetings and appeals, which was abandoned when the present proposal to reduce hours was adopted?

ELAINE MITTLEMAN INTERROGATORIES TO USPS

EM/USPS-20. Will the Postal Service reconsider or provide an opportunity for a rehearing concerning post offices that closed from the beginning of 2011 to the present?

EM/USPS-21. What are the definitions now and with the new plan of main post offices, stations and branches? Will each city have a main post office?

EM/USPS-22. Will the Postal Service provide the same procedures and appeal rights to main post offices, stations and branches for this plan and any other process, including discontinuances and closings?

EM/USPS-23. What is the estimate of the Postal Service concerning the impact of this plan on the operating losses of the Postal Service?

EM/USPS-24. What plans or initiatives is the Postal Service considering for postal facilities that are larger than the facilities included in this plan?

Will those facilities continue to operate the same hours as the present?

ELAINE MITTLEMAN INTERROGATORIES TO USPS

EM-USPS-25. Will the Postal Service pursue discontinuance or consolidation for postal facilities included in this plan?

EM/USPS-26. Will the Postal Service discontinue or consolidate postal facilities after it has reduced retail hours at a facility? Is there a two-step process being considered to first reduce hours and then close the facility?

EM/USPS-27. What is the operating loss of the Postal Service for the last two fiscal years? Does this loss include payments for retirement and health-care benefits? If so, what is the loss without including payments for retirement and health-care benefits?